

EXHIBIT W

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 D.L.; K.S.F.; and K.B.,
5 by and through her parent
6 and next friend H.B.,

7 Plaintiffs,
8 vs.

9 MICHIGAN DEPARTMENT OF
10 EDUCATION,

11 Defendant.

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12 DEPOSITION OF KE'AUJANAA SHEPHERD-FRIDAY

13 Taken by the Defendant at 251 N. Rose Street,
14 Suite 200, Kalamazoo, Michigan, on Tuesday, March 26,
15 2024, commencing at 10:12 a.m.

16 APPEARANCES:

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26 REPORTED BY: Mr. Carl M. DePerro, CSR-4284
27 Certified Shorthand Reporter

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| <p style="text-align: right;">Page 2</p> <p>1 TABLE OF CONTENTS</p> <p>2 WITNESS: PAGE</p> <p>3 KE'AUJANAA SHEPHERD-FRIDAY</p> <p>4 Examination by Ms. Halloran 4</p> <p>5 EXHIBITS: MARKED</p> <p>6 Deposition Exhibit 1, 50</p> <p>Request for a State Complaint Investigation,</p> <p>7 October 3, 2019</p> <p>8 Deposition Exhibit 2, 57</p> <p>Model Due Process Complaint/Request for</p> <p>9 Hearing Form, Date mailed: 11/22/2019</p> <p>10 Deposition Exhibit 3, 58</p> <p>letter, Gina Alexander to George White and</p> <p>11 Gary Start, November 25, 2019</p> <p>12 Deposition Exhibit 4, 59</p> <p>letter, Rebecca McIntyre to George White and</p> <p>13 Gary Start, April 18, 2020 w/attachment</p> <p>14 Deposition Exhibit 5, 62</p> <p>Request for a State Complaint Investigation,</p> <p>15 January 25, 2021</p> <p>16 Deposition Exhibit 6, 69</p> <p>letter, Rebecca McIntyre to George White and</p> <p>17 Jeffrey Thoenes, March 26, 2021 w/attachment</p> <p>18 Deposition Exhibit 7, 70</p> <p>Model Due Process Complaint/Request for</p> <p>19 Hearing Form, undated</p> <p>20 Deposition Exhibit 8, 70</p> <p>Complaint and Request for Special Education</p> <p>21 Due Process Hearing, February 17, 2022</p> <p>22 Deposition Exhibit 9, 77</p> <p>Order of Dismissal, June 17, 2022,</p> <p>23 Lindsay Wilson, Administrative Law Judge</p> <p>24</p> <p>25 (Exhibits Continued on Page 3.)</p> | <p style="text-align: right;">Page 4</p> <p>1 Kalamazoo, Michigan</p> <p>2 Tuesday, March 26, 2024</p> <p>3 At 10:12 a.m.</p> <p>4 COURT REPORTER: Would you raise your right</p> <p>5 hand, please? Do you solemnly swear or affirm that the</p> <p>6 testimony you are about to give in this matter shall be</p> <p>7 the truth, the whole truth, and nothing but the truth,</p> <p>8 so help you God?</p> <p>9 KE'AUJANAA SHEPHERD-FRIDAY: Yes.</p> <p>10 KE'AUJANAA SHEPHERD-FRIDAY,</p> <p>11 HAVING BEEN CALLED BY THE DEFENDANT, AND AFTER HAVING</p> <p>12 BEEN FIRST DULY SWORN, WAS EXAMINED AND TESTIFIED AS</p> <p>13 FOLLOWS:</p> <p>14 EXAMINATION</p> <p>15 BY MS. HALLORAN:</p> <p>16 Q. Could you please state your full name for the record?</p> <p>17 A. Ke'Aujanaa Shepherd-Friday.</p> <p>18 Q. And can you spell that for me?</p> <p>19 A. K-e-'-A-u-j-a-n-a-a Shepherd, S-h-e-p-h-e-r-d -</p> <p>20 F-r-i-d-a-y.</p> <p>21 Q. Miss Shepherd-Friday, my name is Kate Halloran, I am an</p> <p>22 Assistant Attorney General. I represent the Michigan</p> <p>23 Department of Education. Have you ever been deposed</p> <p>24 before?</p> <p>25 A. Have I ever been posed?</p> |
| <p style="text-align: right;">Page 3</p> <p>1 INDEX TO EXHIBITS (Continued)</p> <p>2 Deposition Exhibit 10, 78</p> <p>504 Plan, Meeting Date: 5/5/2017</p> <p>3</p> <p>4 Deposition Exhibit 11, 82</p> <p>504 Plan, Meeting Date: 6/6/2018</p> <p>5 Deposition Exhibit 12, 83</p> <p>504 Plan, Meeting Date: 10/14/2019</p> <p>6</p> <p>7 Deposition Exhibit 13, 85</p> <p>504 Plan, Evaluation Purpose/Plan,</p> <p>Initiation Date for Review/Plan: 3/2/2020</p> <p>8</p> <p>9 Deposition Exhibit 14, 86</p> <p>IEP Team Report, Team Meeting: 9/24/2020</p> <p>10 Deposition Exhibit 15, 86</p> <p>IEP Team Report, Team Meeting: 5/13/2021</p> <p>11</p> <p>12 Deposition Exhibit 16, 88</p> <p>letter, Natasha Shepherd to David Schwark,</p> <p>undated</p> <p>13</p> <p>14 Deposition Exhibit 17, 89</p> <p>First Amended Complaint, Jury Demand</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> | <p style="text-align: right;">Page 5</p> <p>1 Q. Deposed, yes, in a setting like this today where you</p> <p>2 will testify and there is a court reporter here.</p> <p>3 A. No.</p> <p>4 Q. Okay. So just to reiterate, Carl is here taking down</p> <p>5 everything that we say. And so it's important that</p> <p>6 when I ask you a question that you clearly say yes or</p> <p>7 no or I don't know, or whatever your response is so</p> <p>8 that he can take down your answer. Try not to head nod</p> <p>9 or gesture in any way. It's important that you</p> <p>10 verbally respond.</p> <p>11 A. Okay.</p> <p>12 Q. If you don't understand a question that I ask you,</p> <p>13 please feel free to ask me to say it a different way or</p> <p>14 tell me that you don't understand, and I can try and</p> <p>15 say it a different way.</p> <p>16 A. Okay.</p> <p>17 Q. If you need a break, please let me know. I will</p> <p>18 probably have you finish the question that you are</p> <p>19 answering, but we can take a break and slow down at any</p> <p>20 time that you need. Okay?</p> <p>21 A. Okay, no problem.</p> <p>22 Q. Do you have any questions for me before we get started?</p> <p>23 A. My mom is here. Is it okay if she comes up?</p> <p>24 Q. That would be fine.</p> <p>25 MS. KMETZ: Do you care if Mom observes in</p> |

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| <p style="text-align: right;">Page 30</p> <p>1 Q. Do you know for certain if she did?</p> <p>2 A. I don't.</p> <p>3 Q. And I want to just make sure I know the time line of</p> <p>4 the schools that you attended when you were in high</p> <p>5 school.</p> <p>6 The school year 2016 to 2017, was that the</p> <p>7 first year that you were in high school?</p> <p>8 A. Yes.</p> <p>9 Q. And where did you attend?</p> <p>10 A. Kalamazoo Central High School.</p> <p>11 Q. And how about for the 2017 to 2018 school year?</p> <p>12 A. 2017-2018 I think it was Kalamazoo Central still.</p> <p>13 Q. And '18 to '19 school year? Do you remember if that</p> <p>14 was Kalamazoo or Phoenix?</p> <p>15 A. That was Phoenix, definitely.</p> <p>16 Q. And the '19 to '20 school year?</p> <p>17 A. 2019-2020 was Comstock.</p> <p>18 Q. And how about the 20-2021 school year? Where did you</p> <p>19 attend?</p> <p>20 A. Comstock.</p> <p>21 Q. And how about 21-22 school year?</p> <p>22 A. It was still Comstock from there on.</p> <p>23 Q. What kind of school is Phoenix?</p> <p>24 A. Phoenix is an alternative school.</p> <p>25 Q. Do you know what that means by alternative school?</p> | <p style="text-align: right;">Page 32</p> <p>1 So with me being hospitalized a lot during</p> <p>2 the school year, I would come back to school, you know,</p> <p>3 I would feel better and I would come back school and</p> <p>4 they would like oh, she is lying about her sickness, or</p> <p>5 she doesn't have sickle cell, she is lying. Or she</p> <p>6 looks fine.</p> <p>7 And I would always tell people, still to this</p> <p>8 day, looks can be deceiving. I might look like I am</p> <p>9 fine, but I don't feel like I am okay.</p> <p>10 So people, growing up people didn't know</p> <p>11 about sickle cell or they didn't know how I felt,</p> <p>12 nothing. They just bullied me.</p> <p>13 I remember some girl, she was bullying me and</p> <p>14 she said oh, she is faking sickness. I am just like</p> <p>15 well, how can you fake a sickness? If you are sick you</p> <p>16 are sick. Period. It's no ifs ands or buts about it.</p> <p>17 It's not faking nothing.</p> <p>18 And I guess they would state that because of</p> <p>19 my appearance or how I looked. I don't know how I</p> <p>20 dressed. I don't know. But they would just bully me</p> <p>21 because of my, still to this day I get bullied. So</p> <p>22 it's like, I don't know.</p> <p>23 Q. And the teasing, did it culminate in a physical fight?</p> <p>24 A. Yes.</p> <p>25 Q. Tell me about that physical fight. Who was involved,</p> |
| <p style="text-align: right;">Page 31</p> <p>1 A. Somewhat.</p> <p>2 Q. How would you describe it?</p> <p>3 A. I would describe it as -- I don't know what I would</p> <p>4 describe it as because I wasn't even supposed to be</p> <p>5 there. I don't know.</p> <p>6 Q. Do you know why you were moved to Phoenix?</p> <p>7 A. I don't.</p> <p>8 Q. Was there an altercation at school that led to that</p> <p>9 transfer?</p> <p>10 A. Yes.</p> <p>11 Q. Tell me about that altercation.</p> <p>12 A. So the altercation that led to me going to Phoenix was,</p> <p>13 well, from ninth grade on to the time I was at</p> <p>14 Kalamazoo Central me and my siblings were getting</p> <p>15 bullied. Why, there was no reason.</p> <p>16 Q. Was there a physical altercation that happened because</p> <p>17 of the bullying?</p> <p>18 A. (Nods head.)</p> <p>19 Q. Can you tell me a little about it? Take your time?</p> <p>20 A. There was no exact reason, but mine was because of my</p> <p>21 sickle cell. And people, they would bully me because,</p> <p>22 well, I have sickle cell but they didn't know I had</p> <p>23 sickle cell because I wasn't verbally saying oh, I have</p> <p>24 a disability, because I just didn't feel comfortable</p> <p>25 doing that.</p> | <p style="text-align: right;">Page 33</p> <p>1 what happened?</p> <p>2 A. Me and my three sisters from --</p> <p>3 Q. Take your time. And we can take a break if you need</p> <p>4 to.</p> <p>5 A. My older sister, Ke'Asia, she was getting tired of</p> <p>6 people like bullying us. So some girl, the girl that</p> <p>7 was bullying my sister Ke'Asia, I guess she said</p> <p>8 something about me, and she basically got all of her</p> <p>9 friends to like put their hands on my sister. Like</p> <p>10 they basically contemplated on what they wanted to do</p> <p>11 to my sister after class.</p> <p>12 Because my sister had a class with her, and</p> <p>13 after class my sister, we all three of us we had the</p> <p>14 same lunch period. And my sister, she was telling us</p> <p>15 about, you know, the girl in class and how she was</p> <p>16 saying like stuff to her, like not towards her, but</p> <p>17 about her. And like just nitpicking with her in class.</p> <p>18 So after class there was lunch, we had lunch,</p> <p>19 and we was always together at lunch. So my sister, she</p> <p>20 came to lunch. She was telling me and my twin like</p> <p>21 hey, this is just happening in class and, you know,</p> <p>22 basically we were just trying to protect each other.</p> <p>23 Because now, as she was saying like she was, her and</p> <p>24 her friends were contemplating on doing something to my</p> <p>25 sister. They didn't know we had the same lunch period.</p> |

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| <p style="text-align: right;">Page 38</p> <p>1 A. What do you mean by that?</p> <p>2 Q. Was anyone going to the school building for classes, or</p> <p>3 was everyone doing school on the Internet?</p> <p>4 A. Yeah, online. They were going to school online.</p> <p>5 Q. And how about the following year, from fall of 2020 to</p> <p>6 spring of 2021? Was school 100 percent remote?</p> <p>7 A. No, it was still online.</p> <p>8 Q. So it was online that school year?</p> <p>9 A. Yes.</p> <p>10 Q. Were there any in-person classes?</p> <p>11 A. No.</p> <p>12 Q. How did that go for you?</p> <p>13 A. Not good. I still wasn't getting the help that I was</p> <p>14 asking.</p> <p>15 Q. And when you say not good, why was it not good?</p> <p>16 A. Because I was still destined to receive my diploma, and</p> <p>17 I was just a few credits away from receiving my</p> <p>18 diploma. And after like COVID hit and I was</p> <p>19 hospitalized, you know, I decided I am just going to do</p> <p>20 my work online and submit it online.</p> <p>21 And I would ask my teachers, like hey, can I</p> <p>22 get help on this? I would ask questions, and they</p> <p>23 either wouldn't respond or they just wouldn't help me</p> <p>24 at all.</p> <p>25 Q. Were you able to access the materials online?</p> | <p style="text-align: right;">Page 40</p> <p>1 time I had work to accomplish or get done I would log</p> <p>2 on, I would try to get it done. And if I come to</p> <p>3 something that I don't know of, I don't know how to do,</p> <p>4 I would message my teacher, hey, can you help me on</p> <p>5 this assignment. But there never was a response.</p> <p>6 Q. How would you message your teacher?</p> <p>7 A. It was like on the online portal. It was like a</p> <p>8 message, like you can access with your teachers and you</p> <p>9 can message them saying like hey, just contact them and</p> <p>10 ask them any questions or things of that such.</p> <p>11 Q. Did you try contacting them any other way?</p> <p>12 A. Yes. Or I would contact my teachers through email.</p> <p>13 Like if they don't respond through the online portal I</p> <p>14 would contact them through email.</p> <p>15 Q. Do you still have copies of those emails?</p> <p>16 A. Yes, I should have copies.</p> <p>17 Q. For the 2021-2022 school year was school back in person</p> <p>18 for that school year?</p> <p>19 A. No. I think school was out for the rest of that school</p> <p>20 year.</p> <p>21 Q. Okay. So you think it was 100 percent remote '20-21</p> <p>22 and '21-22?</p> <p>23 A. Yes.</p> <p>24 Q. Was it remote for everyone or did you just elect to do</p> <p>25 remote?</p> |
| <p style="text-align: right;">Page 39</p> <p>1 A. No. I was actually kind of like stumped with that.</p> <p>2 Like I would tell them like hey, it's not letting me,</p> <p>3 you know, submit this or whatever the case was. And I</p> <p>4 would email them and say hey, can I get help on this</p> <p>5 project or this assignment. It's not letting me do</p> <p>6 such and such. And they would be like they wouldn't</p> <p>7 say anything. They wouldn't respond.</p> <p>8 Q. And when you were asking for help, what do you mean by</p> <p>9 help?</p> <p>10 A. Like around the time after I was hospitalized and I was</p> <p>11 on bedrest I was asking my teachers like hey, can you</p> <p>12 guys send me my work for this trimester. And it took</p> <p>13 them a while to send my work. So when I did receive my</p> <p>14 work I was behind.</p> <p>15 So as I was trying to catch up I would ask</p> <p>16 like hey, can you help me on this assignment? Like</p> <p>17 what are we supposed to be doing here? Like, you know,</p> <p>18 how am I supposed to go about this? And my teacher,</p> <p>19 she would not help me, she wouldn't answer my question.</p> <p>20 She wouldn't even respond.</p> <p>21 Q. Did you log in for any of the online classes in the</p> <p>22 2020 to 2021 year?</p> <p>23 A. Yes.</p> <p>24 Q. How often would you log on?</p> <p>25 A. I logged on every day. Like any time I needed, any</p> | <p style="text-align: right;">Page 41</p> <p>1 A. No. It was remote for everyone after COVID. Comstock,</p> <p>2 they shut down the school. So it wasn't in person at</p> <p>3 all.</p> <p>4 Q. So Comstock switched to fully remote for everybody?</p> <p>5 A. Yeah.</p> <p>6 Q. Besides the suspension that we talked about before you</p> <p>7 transferred over to Phoenix, have you been suspended</p> <p>8 any other times?</p> <p>9 A. No.</p> <p>10 Q. And are you currently enrolled in high school?</p> <p>11 A. No.</p> <p>12 Q. When is the last time that you were enrolled in high</p> <p>13 school?</p> <p>14 A. The last time, the last school year of Comstock.</p> <p>15 Q. So would you say the end of the '22 school year? Is</p> <p>16 that correct?</p> <p>17 A. Yes.</p> <p>18 Q. And what made you decide not to finish high school?</p> <p>19 A. I didn't decide not to finish because I still would</p> <p>20 like to receive my diploma. Comstock, they just</p> <p>21 weren't helpful at all. And any time I did ask for</p> <p>22 help they would oh, well, yeah, I know KPS, they will</p> <p>23 mention KPS. Well, why are you mentioning KPS when I</p> <p>24 need help? I am confused. So it's like.</p> <p>25 Q. What sorts of things did you want Comstock to do to</p> |

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| <p style="text-align: right;">Page 42</p> <p>1 help you receive your diploma?</p> <p>2 A. Could you rephrase that?</p> <p>3 Q. Yes. What sorts of things were you looking for the</p> <p>4 Comstock Schools to do in order to help you graduate</p> <p>5 from high school?</p> <p>6 A. Like help me with my work and getting those few -- I</p> <p>7 was a few credits away from receiving my diploma. I</p> <p>8 received a credit in one class, but it was just these</p> <p>9 two classes that I was getting, I was not getting help</p> <p>10 in because teachers stopped helping. Like after COVID</p> <p>11 it was just like you guys have the online portal, you</p> <p>12 don't need help.</p> <p>13 Q. What's your understanding of how many more credits you</p> <p>14 need to graduate high school?</p> <p>15 A. Like a few more credits. I think I was like at 20, 20</p> <p>16 credits.</p> <p>17 Q. Do you know how many you need to graduate?</p> <p>18 A. Twenty-six.</p> <p>19 Q. Have attempted to enroll in any adult education</p> <p>20 programs to help finish high school?</p> <p>21 A. No. I was looking into it, but I didn't really fill</p> <p>22 out anything. So no.</p> <p>23 Q. When you say you were looking into it, where did you</p> <p>24 look?</p> <p>25 A. Like online, trying to find like somewhere that could</p> | <p style="text-align: right;">Page 44</p> <p>1 was full or they shut it down because of COVID.</p> <p>2 Q. Do you remember when you asked the principal at</p> <p>3 Comstock about that?</p> <p>4 A. Like around 2021-2022 school year.</p> <p>5 Q. But you haven't asked since then?</p> <p>6 A. Yeah.</p> <p>7 Q. So do you have in any plans in place to receive a high</p> <p>8 school diploma?</p> <p>9 A. Not at the moment, but I would like to have plans in</p> <p>10 order to receive my diploma.</p> <p>11 Q. When you were in school what was your favorite class?</p> <p>12 A. History and English.</p> <p>13 Q. And why did you like those classes?</p> <p>14 A. Because I like to write and I like to learn about like</p> <p>15 things that happened before my time. Like I was</p> <p>16 interested in things like that.</p> <p>17 Q. What would you say your reading level is?</p> <p>18 A. I have a really good reading level.</p> <p>19 Q. What was your least favorite class?</p> <p>20 A. Algebra, only because I didn't understand it.</p> <p>21 Q. Did you have a hard time with math?</p> <p>22 A. I did.</p> <p>23 Q. What would you say your math level is?</p> <p>24 A. I would say my math level is like middle school math</p> <p>25 level. Like ninth grade math. When it comes to</p> |
| <p style="text-align: right;">Page 43</p> <p>1 help me receive the rest of the credits that I need in</p> <p>2 order to get my diploma.</p> <p>3 Q. Where did you look online?</p> <p>4 A. I just Googled like some schools that, some online</p> <p>5 schools that could help.</p> <p>6 Q. Did you do anything besides Google online schools?</p> <p>7 A. (Shakes head.)</p> <p>8 Q. Was that no?</p> <p>9 A. Yes, no.</p> <p>10 Q. So I just want to clarify for the record, so the only</p> <p>11 thing you did was Google some online schools; is that</p> <p>12 right?</p> <p>13 A. Yes, correct.</p> <p>14 Q. Do you know what programs Kalamazoo Public Schools have</p> <p>15 for adults?</p> <p>16 A. I don't.</p> <p>17 Q. How about Comstock? Do you know what programs they</p> <p>18 have for duties?</p> <p>19 A. No.</p> <p>20 Q. Have you asked either school district about adult</p> <p>21 programs?</p> <p>22 A. I asked Comstock, but they never got back to me on</p> <p>23 that. And I think I asked the principal, and he was</p> <p>24 saying that their programs were full I guess, that they</p> <p>25 weren't no longer receiving anybody. I think either it</p> | <p style="text-align: right;">Page 45</p> <p>1 algebra it's like hard.</p> <p>2 Q. Would you say that you oftentimes fell behind on your</p> <p>3 classroom work?</p> <p>4 A. No. Only time I fell behind was when I was</p> <p>5 hospitalized, but I would still get the work done after</p> <p>6 the fact, even if I am behind. I would still try to</p> <p>7 catch up so I could receive that credit. But every</p> <p>8 time I would catch up and when I was behind and turning</p> <p>9 the work and make sure I don't have anything that's</p> <p>10 missing, the teacher, like she wouldn't grade it or</p> <p>11 anything. She would just like.</p> <p>12 Q. What documentation do you have of completing all your</p> <p>13 work and the teacher not grading it?</p> <p>14 A. Like I have emails of my teacher, of me asking my</p> <p>15 teacher like hey, can you grade this? I have done</p> <p>16 this. What can I do to get the grade? Things of that</p> <p>17 such. Like I would communicate.</p> <p>18 Q. Anything else to demonstrate that you completed all</p> <p>19 your work but that the teachers just didn't grade it?</p> <p>20 A. Could you rephrase that?</p> <p>21 Q. Sure. Besides the emails, is there anything else that</p> <p>22 you have that would prove that you completed all of</p> <p>23 your schoolwork but the teachers just didn't grade it?</p> <p>24 A. Besides the emails I don't think I could go back into</p> <p>25 my online portal to see like, you know. So no, I don't</p> |

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| <p>Page 94</p> <p>1 judgment that MDE violated Section 504?</p> <p>2 A. I am not sure.</p> <p>3 Q. And how about Title II of the A.D.A.?</p> <p>4 A. I don't know.</p> <p>5 Q. What does that mean?</p> <p>6 A. I don't know.</p> <p>7 Q. In this requested relief you also ask that MDE</p> <p>8 implement policies and procedures. What policies do</p> <p>9 you want MDE to implement?</p> <p>10 A. I don't know.</p> <p>11 Q. It says that you are asking for compensatory education.</p> <p>12 Are you asking for additional education services?</p> <p>13 A. Yes.</p> <p>14 Q. What services would you like?</p> <p>15 A. To receive my diploma.</p> <p>16 Q. Are you looking for any additional tutoring or study</p> <p>17 materials, anything like that?</p> <p>18 A. Yes.</p> <p>19 Q. What are you looking for?</p> <p>20 A. Laptop, textbooks, and writing utensils.</p> <p>21 Q. And what would the purpose of those be? To take</p> <p>22 additional classes?</p> <p>23 A. Maybe, yes.</p> <p>24 Q. What enforcement do you want MDE to enact statewide?</p> <p>25 A. I don't know.</p> | <p>Page 96</p> <p>1 A. No, I don't.</p> <p>2 MS. HALLORAN: That's it. Nothing further.</p> <p>3 MS. KMETZ: I don't have anything. I think</p> <p>4 we are all set.</p> <p>5 MS. HALLORAN: All right. Thank you so much</p> <p>6 for your time. It was really nice to meet you.</p> <p>7 THE WITNESS: Likewise.</p> <p>8 MS. HALLORAN: I will order that, the same as</p> <p>9 last time.</p> <p>10 (At 2:38 p.m., deposition concluded.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> |
| <p>Page 95</p> <p>1 Q. What monitoring do you want MDE to do in the state?</p> <p>2 A. I don't know.</p> <p>3 MS. HALLORAN: All right. If we could just</p> <p>4 take a ten-minute break, I will review my notes one</p> <p>5 more time. I am likely done, but just a minute. We</p> <p>6 can go back on the record at 2:40. Does that sound</p> <p>7 okay?</p> <p>8 MS. KMETZ: That will work.</p> <p>9 (Recess taken from 2:30 p.m.</p> <p>10 to 2:36 p.m.)</p> <p>11 MS. HALLORAN: We are jumping back in a</p> <p>12 little earlier than anticipated. Just one more</p> <p>13 follow-up question.</p> <p>14 BY MS. HALLORAN:</p> <p>15 Q. When you were in school and had to call out because you</p> <p>16 were going to the hospital, do you know if your mother</p> <p>17 called in after you were released from the hospital or</p> <p>18 before?</p> <p>19 A. Called in while I was hospitalized?</p> <p>20 Q. Yes. What communication, if you know, did your mom</p> <p>21 have with the school about your absences due to your</p> <p>22 hospitalization?</p> <p>23 A. I don't know.</p> <p>24 Q. So you don't know anything about her communication when</p> <p>25 you had to call out?</p> | <p>Page 97</p> <p>1 STATE OF MICHIGAN)</p> <p>2) SS</p> <p>3 COUNTY OF KALAMAZOO)</p> <p>4</p> <p>5</p> <p>6 I, certify that this transcript, consisting</p> <p>7 of 97 pages, is a complete, true, and correct record of</p> <p>8 the testimony of KE'AUJANAA SHEPHERD-FRIDAY, held in</p> <p>9 the case on March 26, 2024.</p> <p>10</p> <p>11 I also certify that prior to taking this</p> <p>12 deposition, KE'AUJANAA SHEPHERD-FRIDAY, was duly sworn</p> <p>13 to tell the truth.</p> <p>14</p> <p>15 Dated: 4-4-2024</p> <p>16</p> <p>17 </p> <p>18 Carl M. DePirro, CSR-4284</p> <p>19 My commission expires: 10-16-25</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> |